

LEECH TISHMAN ROBINSON BROG, PLLC

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*Proposed Attorneys for the Debtor and Debtor in
Possession*

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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Chapter 11

In re:

Case No. 22-22493-shl

SHEM OLAM LLC,

Debtor.

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Declaration of Deborah Hilman

Deborah Hilman, hereby declares the following to be true under penalty of perjury:

1. On July 27, 2022, I gave a one-time payment of \$25,000 to Leech Tishman Robinson Brog, PLLC (“LTRB”) on behalf of the above-captioned debtor (the “Debtor”) in connection with LTRB’s retention by the Debtor in this chapter 11 case.

2. This declaration is submitted in support of the Debtor’s Application for Entry of an Order Authorizing the Employment and Retention of LTRB as Counsel for the Debtor (the “Retention Application”). Pursuant to the Retention Application, the Debtor seeks to retain LTRB to represent the Debtor as bankruptcy counsel.

3. LTRB advised me and I understand that LTRB will act only as counsel to the Debtor during the bankruptcy case. LTRB further advised that if any issues affecting me or

the Debtor arises during the pendency of these cases, I will be required to retain independent legal counsel. I am aware that LTRB has a fiduciary duty to the Debtor and not to me.

I declare under penalty of perjury under the laws of the United States, pursuant to 28 U.S.C. §1746, that the foregoing is true and correct.

Dated: August 31, 2022
Suffern, New York

/s/ Deborah Hilman
Deborah Hilman